

GEORGE B. FREEHILL  
WILLIAM L. JUSKA, JR.  
JAMES L. ROSS\*  
ERIC E. LENCK  
JOHN J. WALSH\*  
PATRICK J. BONNER\*  
PETER J. GUTOWSKI  
MARK F. MULLER  
WAYNE D. MEEHAN\*  
DON P. MURNANE, JR.△  
THOMAS M. RUSSO  
THOMAS M. CANEVARI†  
MICHAEL FERNANDEZ\*  
JOHN F. KARPOUSIS\*△  
MICHAEL E. UNGER\*†  
WILLIAM J. PALLAS\*  
GINA M. VENEZIA △  
LAWRENCE J. KAHN\*  
BARBARA G. CARNEVALE\*  
MANUEL A. MOLINA  
JUSTIN T. NASTRO\*  
PAMELA L. SCHULTZ\*†  
DANIEL J. FITZGERALD\*†△  
MICHAEL C. ELLIOTT\*

\* ALSO ADMITTED IN NEW JERSEY  
† ALSO ADMITTED IN CONNECTICUT  
△ ALSO ADMITTED IN WASHINGTON, D.C.  
° ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF  
**FREEHILL HOGAN & MARRAS**

80 PINE STREET  
NEW YORK, N.Y. 10005-1750

TELEPHONE (212) 425-1400

FACSIMILE (212) 425-1904

E-MAIL: reception@freehill.com

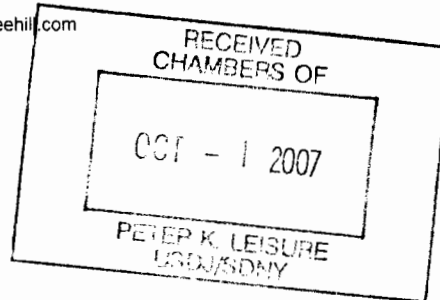
www.freehill.com

**USDC SDNY**  
**DOCUMENT**  
**ELECTRONICALLY FILED**  
DOC #:  
DATE FILED: 10/4/07

NEW JERSEY OFFICE  
850 BERGEN AVENUE  
NEW JERSEY, N.J. 07306  
TELEPHONE (973) 623-5514  
FACSIMILE (973) 623-3813

CONNECTICUT OFFICE  
231 OLD KINGS HIGHWAY SOUTH  
DARIEN, CT 06820-4538  
TELEPHONE: (203) 921-1913  
FACSIMILE (203) 358-8377

**MEMO ENDORSED**



October 1, 2007

Our Ref: 315-07/DPM/MAM

**BY HAND**

The Honorable Peter K. Leisure  
Daniel Patrick Moynihan U.S. Courthouse  
5000 Pearl Street, Room 1910\*  
New York, New York 10007

Re: Deion Navigation v. Icdas\_Celik Enerji Tersane Ve Ulasim Sanayi  
SDNY: 07 CIV 6160 (PKL)

Dear Judge Leisure:

We represent the Plaintiff in connection with the above-referenced action. We write to request an adjournment of the initial status conference that is scheduled for October 4, 2007 at 10:00 a.m.

Plaintiff initiated this action on July 2, 2007 seeking security, in the sum of \$252,891.86, for its maritime claim, via an attachment of Defendant's property in this District pursuant to Rule B. Plaintiff's application was granted on the same day. The writ of maritime was then served upon various New York banks. On July 3, 2007, the Bank of New York advised that it had restrained the full amount being sought by Plaintiff and Notice of Attachment was provided to Defendant on the same day. On July 19, 2007, Plaintiff also provided Notice of Initial Pre-Trial Conference to the Defendant. To this date, however, Defendant has not appeared or moved to vacate the attachment.

The Honorable Peter K. Leisure  
October 1, 2007  
Page 2

In light of the foregoing considerations, we therefore respectfully request that Your Honor grant the within application and adjourn the October 4 conference.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP

*Mannel A. Molina*  
Mannel A. Molina

*Plaintiff's request is granted  
The October 4, 2007 status conference  
is adjourned to November 15, 2007  
at 10:00 a.m.*

